

Remarks

Claims 47-66 are pending and rejected. Applicant respectfully requests allowance of claims 47-66.

Claims 47-55 and 57-65 are rejected under 35 U.S.C. 103(a) over U.S. Patent 5,416,768 (Jahromi) in view of U.S. Patent 5,600,648 (Furuta). Claim 47 requires receiving a primary signal having primary overhead and receiving a secondary signal having secondary overhead. Claim 47 requires *locating unused space* in the primary overhead and inserting the secondary overhead *into the unused space* in the primary overhead. Neither Jahromi nor Furuta *locate unused overhead space*. Neither Jahromi nor Furuta insert overhead from one signal *into the unused overhead space* of another signal.

Jahromi discloses selectively transferring Path Overhead (POH) through a cross-connect matrix. Furuta discloses inspecting the POH of a signal. The combination of Jahromi and Furuta does not suggest *locating unused overhead space* in any signal. The combination of Jahromi and Furuta does not suggest inserting the overhead of one signal *into the unused overhead space* of another signal. The same remarks apply to claims 48-66.

Claim 50 requires locating unused Multiplexer Section Overhead (MSOH) space in the primary signal and inserting the overhead from the secondary signal into the unused MSOH space. In Jahromi, MST 32, MSP 34, and SA 36 processes the MSOH. (See Jahromi, column 5, lines 32-59). MST 32 generates and terminates MSOH. MSP 34 performs protection switching based on the MSOH. SA 36 processes the pointer to the POH in the MSOH. MST 32, MSP 34, and SA 36 do not locate unused space in the MSOH. MST 32, MSP 34, and SA 36 do not insert overhead from another signal into the unused space in the MSOH. In Furuta, MSOH is mentioned because it has the pointer to the POH, and the pointer is needed to inspect the POH. (See Furuta, column 2, lines 44-52). Furuta does not otherwise discuss MSOH. The combination of Jahromi and Furuta does not suggest locating unused MSOH space in one signal and inserting the overhead from another signal into the unused MSOH space. The same remarks apply to claims 48, 58, and 60 (where SDH MSOH in claim 50 is similar to SONET LOH in claims 48 and 58).

Claim 51 requires locating unused Regenerator Section Overhead (RSOH) space in the primary signal and inserting the overhead from the secondary signal into the unused RSOH space. In Jahromi, RST 30 processes the RSOH. (See Jahromi, column 5, lines 32-59). RST 30 generates and terminates RSOH. RST 32 does not locate unused space in the RSOH. RST 30 does not insert the overhead from another signal into the unused space in the RSOH. In Furuta, RSOH is only mentioned once. (See Furuta, column 2, lines 44-52). Furuta does not otherwise discuss RSOH. The combination of Jahromi and Furuta does not suggest locating unused RSOH space in one signal and inserting the overhead from another signal into the unused RSOH space. The same remarks apply to claims 49, 59, and 61 (where SDH RSOH in claim 51 is similar to SONET SOH in claims 49 and 59).

Claim 54 requires locating unused overhead space in the primary signal and inserting MSOH from the secondary signal into the unused overhead space. In Jahromi, MST 32, MSP 34, and SA 36 processes the MSOH. (See Jahromi, column 5, lines 32-59). MST 32 generates and terminates MSOH. MSP 34 performs protection switching based on the MSOH. SA 36 processes the pointer to the POH in the MSOH. MST 32, MSP 34, and SA 36 do not insert the MSOH from one signal into the unused overhead space of another signal. In Furuta, MSOH is mentioned because it has the pointer to the POH, and the pointer is needed to inspect the POH. (See Furuta, column 2, lines 44-52). Furuta does not otherwise discuss MSOH. The combination of Jahromi and Furuta does not suggest inserting the MSOH from one signal into the unused overhead space of another signal. The same remarks apply to claims 52, 62, and 64 (where SDH MSOH in claim 54 is similar to SONET LOH in claims 52 and 62).

Claim 55 requires locating unused overhead space in the primary signal and inserting RSOH from the secondary signal into the unused overhead space. In Jahromi, RST 30 processes the RSOH. (See Jahromi, column 5, lines 32-59). RST 30 generates and terminates RSOH. RST 32 does not insert the RSOH of one signal into the unused overhead space of another signal. In Furuta, RSOH is only mentioned once. (See Furuta, column 2, lines 44-52). Furuta does not otherwise discuss RSOH. The combination of Jahromi and Furuta does not suggest inserting the RSOH from one signal into the unused

overhead space of another signal. The same remarks apply to claims 53, 63, and 65 (where SDH RSOH in claim 55 is similar to SONET SOH in claims 53 and 63).

Applicant respectfully points out that both Jahromi and Furuta represent the problem in the prior art that is solved by the claimed invention. Jahromi provides end-to-end POH, but appears to handle MSOH and RSOH in a conventional manner. Furuta inspects POH, but also appears to handle MSOH and RSOH in a conventional manner. Thus, Jahromi and Furuta ***modify*** the MSOH and RSOH at multiplexer and regenerator nodes. Jahromi and Furuta do not maintain the original MSOH and RSOH by hiding them in unused overhead space. The combination of Jahromi and Furuta could not receive an SDH signal having original MSOH and RSOH, transfer the signal through various multiplexer and regenerator nodes (that would modify the MSOH and RSOH), and then recreate the SDH signal with the original MSOH and RSOH.

Claims 56 and 66 are rejected under 35 U.S.C. 103(a) over U.S. Patent 5,416,768 (Jahromi) in view of U.S. Patent 5,600,648 (Furuta) further in view of U.S. Patent 5,434,858 (Shimada). Claims 56 and 66 are patentable for at least the reasons given above.

Applicants submit that there are numerous additional reasons in support of patentability, but that such reasons are moot in light of the above remarks and are omitted in the interests of brevity. Applicant respectfully requests allowance of claims 47-66.

The Applicant believes no fees are due with respect to this filing. However, should the Office determine additional fees are necessary, the Office is hereby authorized to charge Deposit Account No. 210765.

Respectfully submitted,

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SIGNATURE OF PRACTITIONER

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